

From: [Daniel Dodd](#)
To: [Zuniga, Mario](#)
Cc: [Yannayon, Laura](#); [Dancher, Nathan](#); [Batchelder, Amber](#); ["Mary Giraudo"](#); [Johan Van Walsem](#); [Meredith Roberts](#)
Subject: RE: Subpart EEEE Applicability Determination
Date: Thursday, May 21, 2020 8:49:57 PM
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Mario,

You are indeed correct; the syngas that's "recycled" has gone through all of the same gas cleaning stages ultimately reaching a common 'low pressure syngas header', from which it can be recycled to the FastOx gasification process, or sent to the downstream syngas-conversion processes.

So yes, even though the arrow in the diagram seems to "exit" the gas cleaning prematurely, it is the same high quality syngas (being used as an 'auxiliary fuel') to ensure it works satisfactorily in either the standard burners, or the in the syngas genset.

Let us know if there's anything else.

Kind regards,

V/R,
DMD



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From: Zuniga, Mario <zuniga.mario@epa.gov>
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Subject: Subpart EEEE Applicability Determination

Good morning Daniel,

Before we finalize our determination that the FastOx Gasification is not subject to NSPS Subpart EEEE, we would like some clarification on the syngas being used in the 12 burners as shown in the diagram below:

Overview of the FastOx Gasification Process at FHL

In Figure 7 below is a block flow diagram of the FHL system and major stream flows.

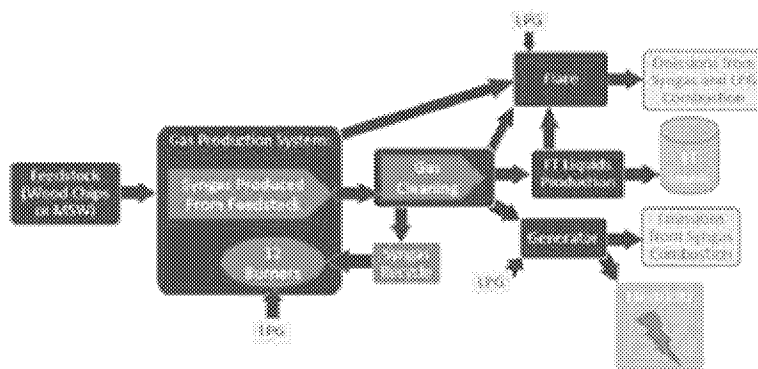


Figure 7. Schematic of the FHL FastOx Gasification to Sustainable End-Products System

The diagram shows some syngas is routed from the gas cleaning process to the 12 burners and is combusted.

Is the syngas that is combusted in the burners the same quality syngas that would otherwise go to the generator (i.e. has it undergone the complete cleaning process)? The diagram shows syngas is being recycled and we want to understand the quality of the syngas in that process.

If the syngas being routed to the burners is the same clean syngas that would otherwise go to the generator, it would be considered fuel instead of waste.

Thank you,

Mario Abraham Zuñiga
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